ADEM

ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)
COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

1) AUTHOR OF REPORT

Jonah Harris
Environmental Scientist Sr.
Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) FACILITY INFORMATION

Aerospace Coatings International, LLC (ACI)
370 Knight Drive
Oxford (Talladega County), AL 36203

EPA Identification Number: ALR000026872
NAICS Code(s): 332813, 332710, 332999

3) RESPONSIBLE OFFICIALS

Mr. Anthony Landingham, Safety & Environmental Manager
Telephone: 256-241-2750
Email: tony.landingham@aerocoatings.com

4) INSPECTION PARTICIPANTS

Mr. Anthony Landingham, Safety & Environmental Manager – ACI
Ms. Paula Whiting, Environmental Engineer – US EPA Region 4
Mr. Jonah Harris, Environmental Scientist Sr. – ADEM

5) DATE OF INSPECTION

June 25, 2019

6) APPLICABLE REGULATIONS

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

7) PURPOSE OF INSPECTION

The purpose of the inspection was to determine the facility's compliance with all applicable standards of Division 14 of the ADEM Administrative Code.

8) FACILITY DESCRIPTION

ACI specializes in the repair and maintenance of aircraft parts and components (including landing gear, hydraulic valve bodies, and pneumatic devices). The facility consists of a 120,000 square foot main building (where maintenance / repair is performed on hydraulic and pneumatic parts), a 90,000 square foot LG building (where landing gear components are maintained / repaired), and a small stripper shop (where old coatings are removed from aircraft parts). A separate maintenance building is currently being constructed. The main building includes two machine shops, a plating preparation area, two plating rooms, one paint booth, one Plasma ™ coating area, a honing shop, a maintenance area, a quality assurance / quality control (QA/QC) laboratory, and an office area. The LG building includes a plating preparation area and one plating room. The stripper shop includes a stripping room and the facility's central hazardous waste accumulation area (CAA). ACI currently employs 172 people. The facility typically operates Monday through Friday (variable hours). According to its last submittal of ADEM Form 8700-12 (which was received by the Department on June 7, 2019), ACI is a large quantity generator of hazardous waste and a small quantity handler of universal waste.

9) OBSERVATIONS

Ms. Whiting and I arrived at the facility at approximately 10:10 am and were subsequently greeted by Mr. Landingham. During the opening conference that followed, Ms. Whiting and I identified ourselves and explained the purpose of the inspection. According to Mr. Landingham, the facility's operations consist of the following: removing existing coatings from parts in the stripper shop, repairing parts as necessary in the ID shop and OD shop, cleaning parts with methyl ethyl ketone (MEK) and applying masking tape to parts as necessary in the plating preparation room, applying a variety of coatings (including paint, Plasma ™ powder coat, and a several metal coatings via electroplating) to the parts as necessary, finishing the parts in the honing shop as necessary, and testing the parts in the QA/QC laboratory to ensure they meet applicable quality standards.

According to Mr. Landingham, the following wastes are generated at the site: electroplating wastes including chromic acid waste (D002, D007), waste cyanide solution (D003, F007), chromium / lead waste (D007, D008), waste sodium hydroxide solution (D002, D006, D007), and hydrochloric acid (D002); chromium-contaminated personal protective equipment (PPE), masking material, and other solids (D007); waste MEK (D001, D035); waste paint-related materials (D001); laboratory wastes (D007); used blast media; baghouse dust removed from the facility's air pollution control system; used cutting oil; and universal waste lamps. Mr. Landingham stated that liquid electroplating wastes generated at the site are placed in plastic totes and subsequently tested to determine if they meet certain specifications. Materials that meet those specifications are reused in the facility's plating operations. Materials that cannot be reused on-site are declared to be wastes and are immediately shipped off-site for disposal. Mr. Landingham told us that some used blast media generated at the site is hazardous and some used blast media generated at the site is non-hazardous. Blast media used on parts that contain heavy metals (such as cadmium, chromium, and lead) is managed as hazardous waste (D006, D007, D008), while blast media used on other parts is managed as non-hazardous waste. Baghouse dust removed from the facility's air pollution control system is non-hazardous, according to Mr. Landingham. Used cutting oils generated in the facility's metalworking machines is collected in plastic totes, analyzed, and reused on-site (if possible).

Following the opening conference, Mr. Landingham accompanied Ms. Whiting and me on a tour of the facility. During the walk-through inspection, we observed the following areas:

A) Waste Staging Area

Mr. Landingham first escorted us outside, to a concrete lot located between the main building (to the west), the LG building (to the east), and the stripper building (to the south). Thirteen plastic 330-gallon totes containing waste chromic acid were staged on the lot at the time of the inspection. All thirteen containers were closed, labeled with the words "Hazardous Waste", labeled with the appropriate waste codes (D002 and D007), labeled with a "Corrosive" placard, and marked with an accumulation start date of "6-25-19"

(refer to Photograph #1 and Photograph #2 in the attached photo log). Mr. Landingham told us that the contents of the totes had been declared to be wastes earlier that day and that they would be shipped off-site for disposal later that day. The following materials were also staged in this area at the time of the inspection:

- Two 330-gallon plastic totes of used nickel plating solution that were closed and labeled with the words "Nickel Solution Product" (see Photograph # 3 and Photograph #4);
- One 330-gallon plastic tote of used Zyglo ™ solution that was closed and labeled with the words "Used Zyglo Product" (see Photograph #5); and
- One 250-gallon plastic tote of used hydrochloric acid solution that was closed and labeled with the words "Hydrochloric Acid Solution Product" (see Photograph #6).

According to Mr. Landingham, these materials were not wastes. They had been tested, had met the applicable specifications, and would be reused on-site.

B) Multi-Purpose Plating Line

Mr. Landingham next escorted us to the facility's multi-purpose plating line—an enclosed room located on the south side of the main building. A blasting cabinet was staged in the hallway outside of the multi-purpose plating line. According to Mr. Landingham, parts containing cadmium are blasted in this cabinet. Two satellite accumulation containers (open-top metal 55-gallon drums holding spent blast media, filters, and PPE) were staged next to the blasting cabinet. Both drums were open (their lids were not secured) and labeled with the words "Hazardous Waste" and "D006" (see Photograph #7 and Photograph #8). The total amount of waste accumulated in this area appeared to be greater than 55 gallons. Spent blast media was observed on the floor around the drums.

The multi-purpose plating line includes a series of small plating baths used to apply a variety of coatings (including black oxide, cadmium, chromium, copper, magnesium phosphate, nickel, silver, and zinc) to small airplane parts. These baths were equipped with secondary containment (some were staged on plastic spill control pallets, some were staged within plastic basins, and some were surrounded by concrete berms). Liquids were observed in the secondary containment structures of several of the baths. One open-top plastic 55-gallon drum containing nickel-contaminated PPE was staged in a corner of the room. The container was open (the lid was not secured) and labeled with the words "Non-Hazardous Waste" (see Photograph #9). One satellite accumulation container (an open-top plastic 55-gallon drum holding chromium-contaminated PPE) was staged on the opposite side of the room. The container was open (its lid was not secured) and labeled with the words "Hazardous Waste", "D003", and "F007" (see Photograph #10 and Photograph #11).

C) Plating Preparation Area

Mr. Landingham next escorted us to the plating preparation area, which is located next to the multi-purpose plating line. Two wash stands containing new MEK were staged on spill control pallets near the center of the plating preparation area. Blast cabinets of various styles and sizes were staged along the walls in this area. According to Mr. Landingham, each blast cabinet is used to clean a different type of part. One satellite accumulation container (an open-top metal 55-gallon drum containing cadmium-contaminated blast media) was connected to the cyclone of a blast cabinet used to clean cadmium-containing parts. The container was closed (it was attached to the cyclone via a flexible hose) and labeled with the words "Hazardous Waste" and "D006" (see Photograph #12 and Photograph #13). A satellite accumulation container (an open-top metal 55-gallon drum containing chromium-contaminated debris) was also staged next to the blast cabinet. The container was closed (it was equipped with a snap-on plastic lid) and labeled with the words "Hazardous Waste" and "D007". A shop vacuum was also observed in this area. According to Mr. Landingham, the shop vacuum is used to clean up chromium-contaminated dust / debris; it is periodically emptied into the aforementioned satellite accumulation container. At the time of

the inspection, the shop vacuum contained chromium-contaminated debris and was not labeled.

D) Chrome Plating Line

Mr. Landingham next escorted us to the chrome plating line—an enclosed room located next to the plating preparation area. This room contained a series of large plating baths used to apply chromium coatings to airplane parts. These baths were suspended over a grated concrete pit, which contained liquids at the time of the inspection (see Photograph #14 and Photograph #15). These liquids were being pumped into a 330-gallon plastic tote, which was labeled with the words "Do Not Discard" and "Chromic Acid Product" (see Photograph #16). Four satellite accumulation containers (two open-top metal 55-gallon drums and two metal 5-gallon step cans) of chromium-contaminated PPE were staged near the chrome plating line. All four containers were closed (they were equipped with metal lids) and labeled with the words "Hazardous Waste" and "D007" (see Photograph #17 through Photograph #20). According to Mr. Landingham, all PPE generated in this area is managed as hazardous waste. He stated that PPE is first accumulated in the small step cans, which are then emptied into the larger drums.

E) OD Shop

Mr. Landingham next accompanied us on a tour of the OD Shop—a work area in the main building that houses a variety of large metalworking machines used to refurbish / repair the outer diameter of aircraft parts. The floor in this area was equipped with a series of grated concrete troughs that catch spills / releases of cutting fluids from the metalworking machines. These troughs were full of liquid (see Photograph #21 and Photograph #22). According to Mr. Landingham, facility personnel periodically use a portable pump to transfer the contents of the floor troughs into a 330-gallon plastic tote. The material is then tested to determine if it can be reused on-site. One such tote was being filled at the time of the inspection (see Photograph #23 through Photograph #25). The container was labeled with the words "Used Coolant Product Pending Disposition".

Two satellite accumulation containers (open-top metal 55-gallon drums holding chromium-contaminated sludge removed from metalworking machines) were staged in the OD shop. One was closed (it was equipped with a latched metal lid) and labeled with the words "Hazardous Waste" and "D007" (see Photograph #26). The other (which was located on the opposite side of the OD shop) was open (its lid was not secured) and labeled with the words "Hazardous Waste" and "D007" (see Photograph #27). The sides of both drums were covered with chromium-contaminated sludge. One satellite accumulation container (an open-top plastic 5-gallon bucket containing used blast media) was connected to a shot peen machine in the OD shop. The container was closed (it was attached to the shot peen machine via a flexible hose) and labeled with the words "Blast Residue is Hazardous Waste (Chromium/Cadmium)—Dispose of in Hazardous Waste Drums" (see Photograph #28 and Photograph #29). A second satellite accumulation container (an open-top metal 55-gallon drum containing used blast media) was also staged near the shot peen machine. The container was closed and labeled with the words "Hazardous Waste", "D007", and "D008" (see Photograph #30).

F) Stripper Shop

Mr. Landingham next escorted us to the stripper shop—a separate building that houses a series of hydrochloric acid baths and sodium hydroxide baths used to remove existing coatings from airplane parts. These baths were suspended over a grated concrete pit, which contained liquids at the time of the inspection (see Photograph #31). According to Mr. Landingham, the contents of the pit are periodically pumped into 330-gallon plastic totes and then tested to determine if they can be reused on-site.

G) Exterior of Main Building

Mr. Landingham next accompanied us on a tour of the concrete lot outside of the main building. Four dust collectors connected to the facility's air pollution control system were located on the south side of the

building. Each of these dust collectors was attached to an open-top metal 55-gallon drum. Each drum was closed and labeled with the words "Non-Hazardous Waste" (see Photograph #32 through Photograph #34). According to Mr. Landingham, one of the dust collectors is connected to the Plasma ™ coating area and collects overspray of powdered metal coating. According to Mr. Landingham, the facility does not have a separate waste profile for the contents of the dust collector connected to the Plasma ™ coating area even though its contents are expected to be different from those of the other dust collectors. Four intact lead-acid batteries were staged on a wooden pallet near the cyclones (see Photograph #35). Mr. Landingham told us that they were new / unused batteries (not waste).

H) ID Shop

Mr. Landingham next accompanied us on a tour of the ID Shop—a work area in the main building that houses a variety of large metalworking machines used to refurbish / repair the inner diameter of aircraft parts. The floor in this area was equipped with a series of grated concrete troughs that catch spills / releases of cutting fluids from the metalworking machines. These troughs were full of liquid (see Photograph #36). According to Mr. Landingham, facility personnel periodically use a portable pump to transfer the contents of the floor troughs into a 330-gallon plastic tote. The material is then tested to determine if it can be reused on-site. One satellite accumulation container (an open-top metal 55-gallon drum holding chromium-contaminated debris) was staged near the center of the ID shop. The drum was closed (it was equipped with a latching metal lid) and labeled with the words "Hazardous Waste" and "D007" (see Photograph #37).

A totally enclosed negative-pressure paint booth was located in a corner of the ID Shop. One satellite accumulation container (an open-top metal 55-gallon drum holding paint-related wastes) was staged in the paint booth at the time of the inspection. The container was open (its lid was not secured) and labeled with the words "Hazardous Waste", "D001", and "D035" (see Photograph #38 and Photograph #39). Seven universal waste lamps were staged on a rolling cart outside of the paint booth (see Photograph #40). These lamps were not labeled and had not been placed in a container.

I) Maintenance Area

Mr. Landingham next escorted us to ACI's maintenance area, which is located on the second floor of the main building. A wooden crate containing universal waste lamps was staged on a shelf in this area (see Photograph #41). The crate was open, labeled with the words "Universal Waste" and "Used Lamps", and dated "1-3-17". According to Mr. Landingham, the date on the crate is incorrect (he told us that ACI's universal waste lamps were last shipped off-site in January of 2019).

J) Honing Shop

Mr. Landingham next escorted us to the honing shop—an enclosed room located next to the maintenance area where coated parts are polished to meet customer specifications. Several small polishing machines were staged in this area. Two wash stands containing new MEK were staged in the center of the room. The following containers were staged on spill control pallets in a corner of the room:

- Three open-top metal 55-gallon drums of used grit that were open and labeled with the words "Non-Hazardous Waste";
- Two open-top plastic 55-gallon drums of metal screens that were open and labeled with the words "Non-Hazardous Waste"; and
- One open-top metal 55-gallon drum of insulation blankets that was open and labeled with the words "Non-Hazardous Waste".

K) Plasma ™ Coating Area

Mr. Landingham next escorted us to the Plasma ™ coating area—an enclosed room located next to the honing shop where Plasma ™ coating (a high-zinc metallic powder) is applied to parts as necessary. The Plasma ™ coating area houses two totally enclosed negative-pressure spray booths where robotic arms apply Plasma ™ coating to parts using a high-velocity flame spray system. One wash stand containing new MEK was staged in this area. One satellite accumulation container (a closed-top metal 55-gallon drum holding used MEK) was staged within a metal cabinet located outside of the Plasma ™ coating area. The container was open (a funnel had been placed in the drum's bung hole) and labeled with the words "Hazardous Waste", "D001", and "D035" (see Photograph #42 and Photograph #43).

L) LG Building Preparation Room

Mr. Landingham next escorted us to the plating preparation room located in the LG building. One satellite accumulation container (a metal 5-gallon step can holding chromium-contaminated PPE) was staged in the plating preparation room at the time of the inspection. The container was closed (it was equipped with a metal lid) and labeled with the words "Hazardous Waste" and "D007" (see Photograph #44 and Photograph #45). One satellite accumulation container (an open-top metal 55-gallon drum containing chromium-contaminated blast media) was connected to the cyclone of a blast cabinet. The container was closed (it was attached to the cyclone via a flexible hose) and labeled with the words "Hazardous Waste" and "D007" (see Photograph #46). A satellite accumulation container (an open-top metal 55-gallon drum containing chromium-contaminated debris) was also staged next to the blast cabinet. The container was open (its lid was not secured) and labeled with the words "Hazardous Waste" and "D007" (see Photograph #47).

M) LG Building Plating Line

Mr. Landingham next accompanied us on a tour of the plating line in the LG building—an enclosed room that contained a series of large plating baths used to apply a variety of coatings (including cadmium, chromium, nickel, and titanium cadmium) to landing gear parts. These baths were suspended over a grated concrete pit, which contained liquids at the time of the inspection. Mr. Landingham informed us that the LG building is equipped with a fluid recirculation system that collects liquids from the pit and pumps them into plastic totes so they can be reused on-site. Nine 330-gallon plastic totes of used chromic acid were staged in this area. Each tote was closed and labeled with the words "Chromic Acid Product".

N) Central Hazardous Waste Accumulation Area

Mr. Landingham next escorted us to ACI's CAA, which is attached to the stripper shop. The thirteen plastic 330-gallon totes of waste chromic acid that were observed in front of the CAA earlier in the day had been shipped off-site by this time. Both entrances to the CAA (one roll-up door and one personnel door) were locked / secured at the time of the inspection. Signs bearing the words "Danger" and "Unauthorized Personnel Keep Out" were posted near the entrances (see Photograph #48). The following wastes were staged in the CAA at the time of the inspection:

- Six open-top metal 55-gallon drums of chromium-contaminated PPE that were closed, labeled with the words "Hazardous Waste", marked with the applicable waste codes (D007), and marked with an accumulation start date (the oldest container present was dated "5-28-19") (see Photograph #49);
- Six closed-top metal 55-gallon drums of waste MEK that were staged on plastic spill control pallets, closed, labeled with the words "Hazardous Waste", marked with the applicable waste codes (D001 and D035), and marked with an accumulation start date (the oldest container present was dated "5-28-19") (see Photograph #50);

- One open-top metal 55-gallon drum of solid paint-related waste that was closed, labeled with the words "Hazardous Waste", marked with the applicable waste codes (D001 and D035), and marked with an accumulation start date of "6-24-2019" (see Photograph #51);
- One closed-top metal 55-gallon drum of used oil that was staged on a plastic spill control pallet, closed, and labeled with the words "Used Oil" (see Photograph #52); and
- One open-top plastic 55-gallon drum of used oil that was staged on a plastic spill control pallet, closed, and labeled with the words "Used Oil / Coolant Cimcool" (see Photograph #53).

O) QA/QC Laboratory

Mr. Landingham next escorted us to the facility's QA/QC laboratory, which is located in the main building. One satellite accumulation container (an open-top metal 30-gallon drum holding chromium-contaminated PPE) was staged in the laboratory at the time of the inspection. The container was open (its lid was not secured) and labeled with the words "Hazardous Waste" and "D007" (see Photograph #54 and Photograph #55). Another satellite accumulation container (a 1-gallon glass jar holding waste chemicals) was staged on a counter in the laboratory. The container was closed (it was connected via flexible tubing to a titration stand) and labeled with the words "Chemical Waste" and "0.100 Normal Ferrous Ammonium Sulfate" (see Photograph #56). Signs bearing the words "Corrosive" and "Chromic Acid Products & Waste Storage" were affixed to the cabinet doors beneath the aforementioned container (see Photograph #57). The following wastes were staged in the cabinet at the time of the inspection (see Photograph #58):

- Two plastic 5-gallon jugs of chromic acid waste that were closed and labeled with the words "Hazardous Waste" and "D007";
- Two glass 1-gallon jugs of waste chemicals that were closed and labeled with the words "Chemical Waste";
- Two glass 1-gallon jugs of waste chemicals that were closed and labeled with the words "Non-Hazardous Waste"; and
- One closed, unlabeled plastic container that appeared to hold unused chemicals.

Following the walk-through inspection, Mr. Landingham provided us with the following documents for review: waste profiles (including the profile for baghouse dust); manifests for shipments of hazardous waste, universal waste, and used oil; job titles / descriptions for employees that manage hazardous waste at the facility; records indicating that hazardous waste management training has been provided to facility personnel; a waste minimization plan; records of weekly inspections of the facility's CAA; and the facility's contingency plan. Our review and evaluation of these records showed the following:

- The waste profile for baghouse dust did not appear to be complete (one profile is kept on file for multiple dust collectors that draw air from different areas of the plant where different materials are managed);
- Chromic acid waste (D002, D007) is picked up by Freehold Cartage, Inc. (NJD054126164) and delivered to Inmetco Corp. (PAD087561015);
- Waste cyanide solution (D003, F007) and hazardous used blast media (D006, D007, D008) are picked up by Freehold Cartage, Inc. and delivered to EQ Detroit (MID980991566);
- Waste sodium hydroxide solution (D002, D006, D007) and waste hydrochloric acid (D002) is picked up by Safeway Industrial Services (ALR000053272) and delivered to Alpha Omega Recycling, Inc. (TXD981514383);
- Waste MEK (D001, D035), chromium-contaminated PPE and masking material (D007), and waste paint-related materials (D001) are picked up by Safeway Industrial Services and delivered to EQ Alabama, Inc. (ALD983177015);

- The job description for "Maintenance II and Millwright I/II"—a position that includes management of hazardous wastes generated throughout the facility—did not include a description of the waste management duties personnel holding that position would be required to perform;
- Hazardous waste management training ("Hazardous Communication and RCRA Hazardous Waste" and "ACI Initial / Recurrent RCRA Haz Waste Management Training") was last provided to facility employees in 2019;
- Records of weekly inspections of the facility's CAA did not include the time of each inspection;
- ACI's contingency plan was last updated on November 12, 2018 and did not include a quick reference guide; and
- Records that copies of the contingency plan had been delivered to local emergency response agencies were not available for review.

10) SUMMARY

The following areas of concern were noted during the inspection:

- Eight satellite accumulation containers of hazardous waste were not closed;
- Four satellite accumulation containers of hazardous waste were not labeled with the words "Hazardous Waste";
- Greater than 55 gallons of hazardous waste from a single waste stream was being accumulated in one satellite accumulation area;
- Three satellite accumulation containers were not managed in a manner adequate to prevent releases of waste to the environment (hazardous waste was observed on the sides of these containers and/or on the floor around these containers);
- The contents of two satellite accumulation containers in the chrome plating line were emptied into larger satellite accumulation containers instead of being moved to the CAA;
- Universal waste lamps in the ID shop and in the maintenance area were not placed in closed containers;
- A complete / accurate waste determination had not been performed on baghouse dust generated in the air pollution control system connected to the Plasma ™ coating area;
- Records of weekly inspections of the facility's CAA did not include the time of each inspection;
- The facility's contingency plan did not include a quick reference guide; and
- Records that copies of the contingency plan had been delivered to local emergency response agencies were not available for review.

Following the document review, Ms. Whiting and I discussed our observations with Mr. Landingham in a closing conference. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* describing the abovementioned areas of concern and presented it to Mr. Landingham. He reviewed, signed, and accepted the *Preliminary Inspection Report* on behalf of ACI. Ms. Whiting and I concluded the closing conference and departed the site at approximately 5:00 pm.

11) **SIGNED**

_____
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

July 9, 2019
Date

12) **CONCURRENCE**

_____
Brent A. Watson, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

July 9, 2019
Date

Attachment: Photographs of the Installation

File: 21354 ALR000026872 121 20190709 HWTM Trip Report

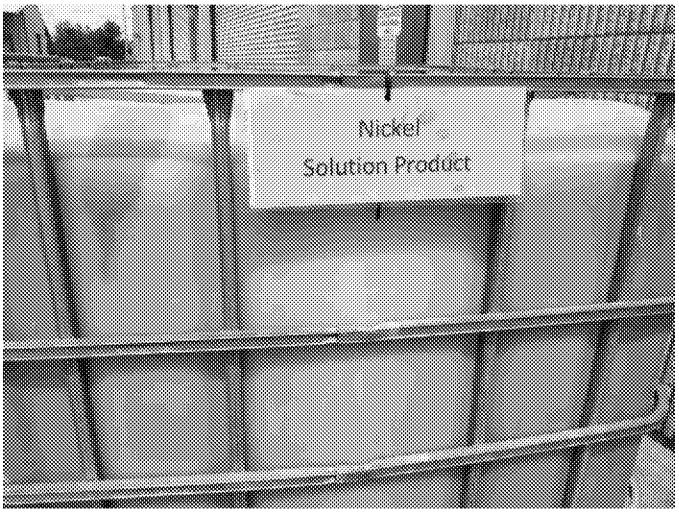
PHOTOGRAPHS OF THE INSTALLATION

Photograph #1: containers of hazardous waste staged outside the CAA

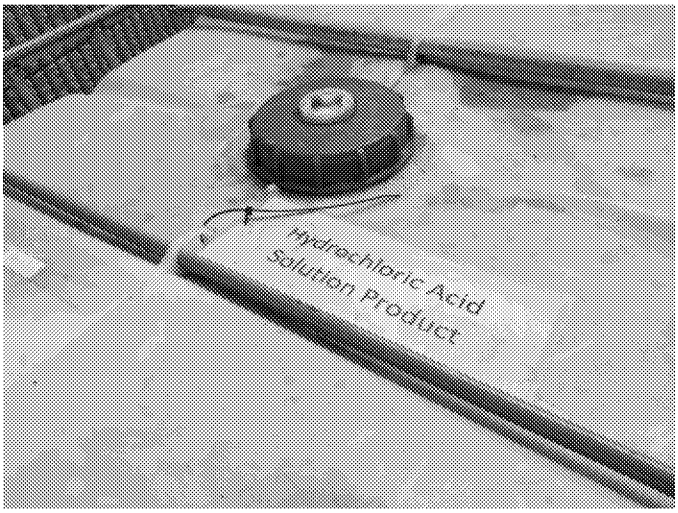
Photograph #4: container of used chemicals (not waste) staged outside the CAA

Photograph #2: label on a container of hazardous waste staged outside the CAA

Photograph #5: container of used chemicals (not waste) staged outside the CAA

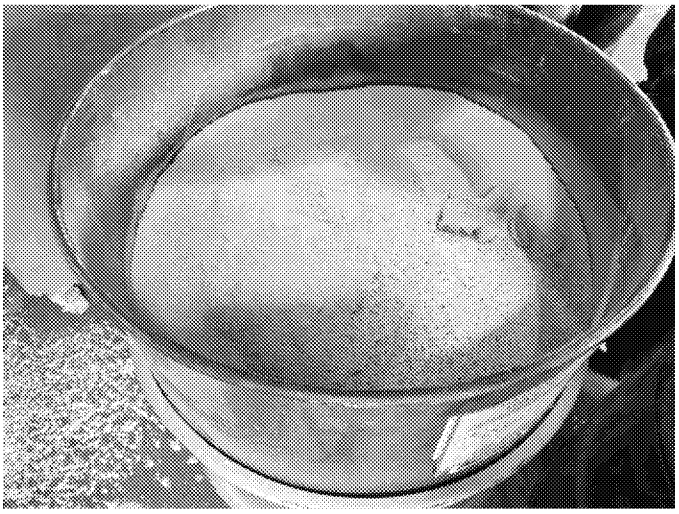


Photograph #3: container of used chemicals (not waste) staged outside the CAA

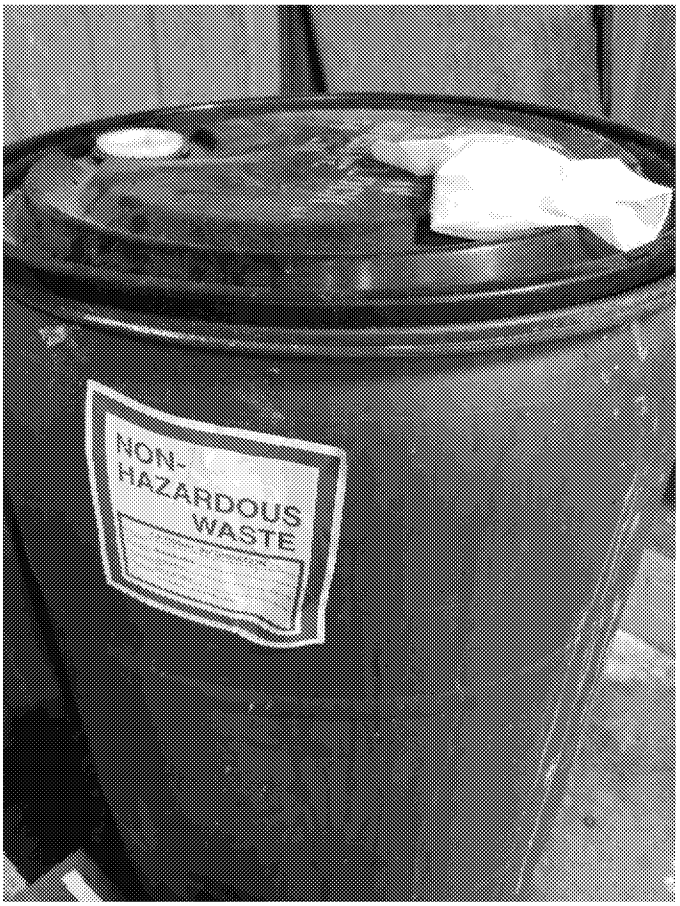


Photograph #6: container of used chemicals (not waste) staged outside the CAA

PHOTOGRAPHS OF THE INSTALLATION



Photograph #7: open satellite accumulation container staged outside the multi-purpose plating line

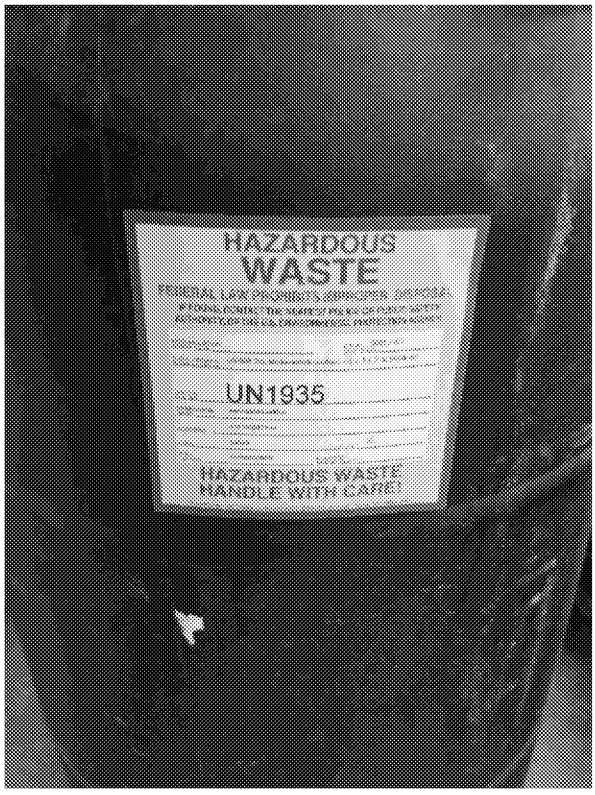


Photograph #9: container of non-hazardous waste in the multi-purpose plating line

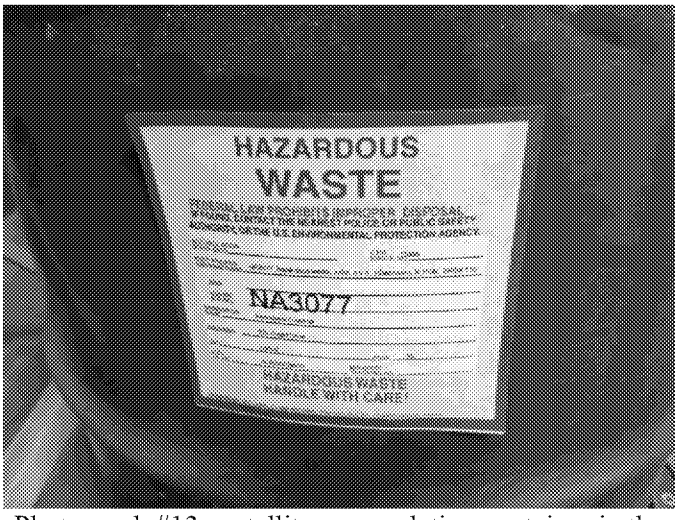
Photograph #8: open satellite accumulation container staged outside the multi-purpose plating line

Photograph #10: open satellite accumulation container in the multi-purpose plating line

PHOTOGRAPHS OF THE INSTALLATION

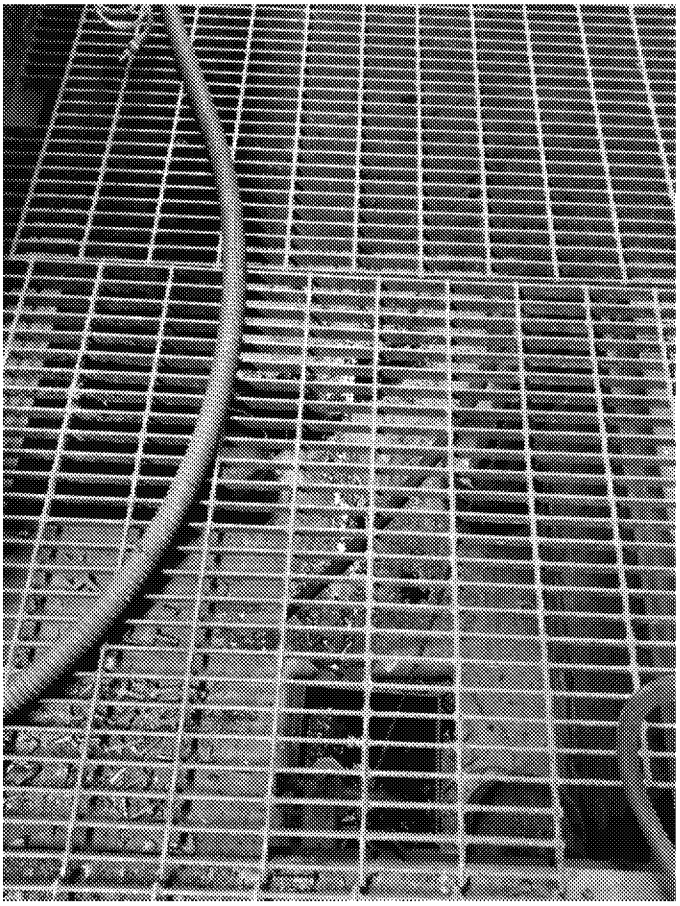


Photograph #11: open satellite accumulation container in the multi-purpose plating line



Photograph #13: satellite accumulation container in the plating preparation area

Photograph #12: satellite accumulation container in the plating preparation area



Photograph #14: sump in the floor underneath the chrome plating line (contained liquid at the time of the inspection)

PHOTOGRAPHS OF THE INSTALLATION

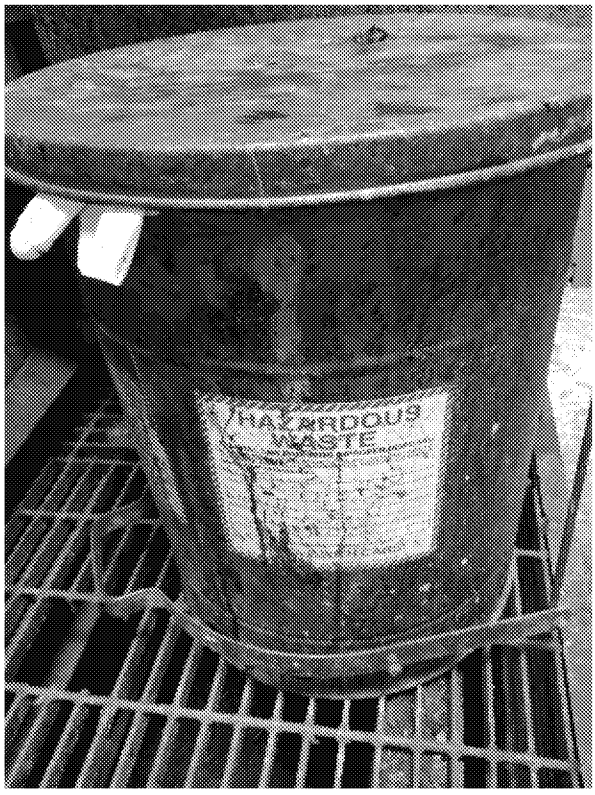
Photograph #15: sump in the floor underneath the chrome plating line (contained liquid at the time of the inspection)

Photograph #16: container of used chemicals (not waste) staged outside the chrome plating line

Photograph #17: satellite accumulation container in the chrome plating line

Photograph #18: satellite accumulation container in the chrome plating line

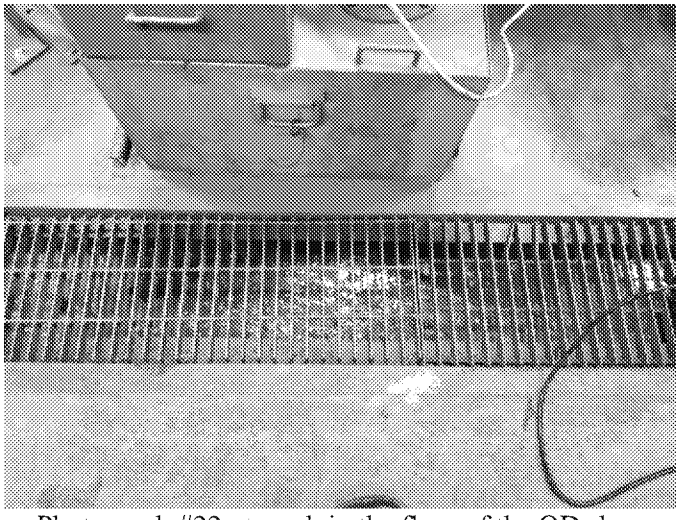
PHOTOGRAPHS OF THE INSTALLATION



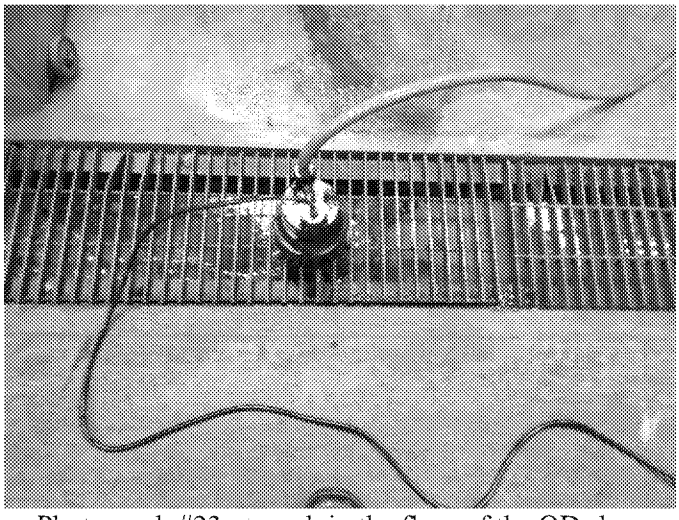
Photograph #19: satellite accumulation container in the chrome plating line

Photograph #20: satellite accumulation container in the chrome plating line

Photograph #21: trough in the floor of the OD shop (contained liquid at the time of the inspection)

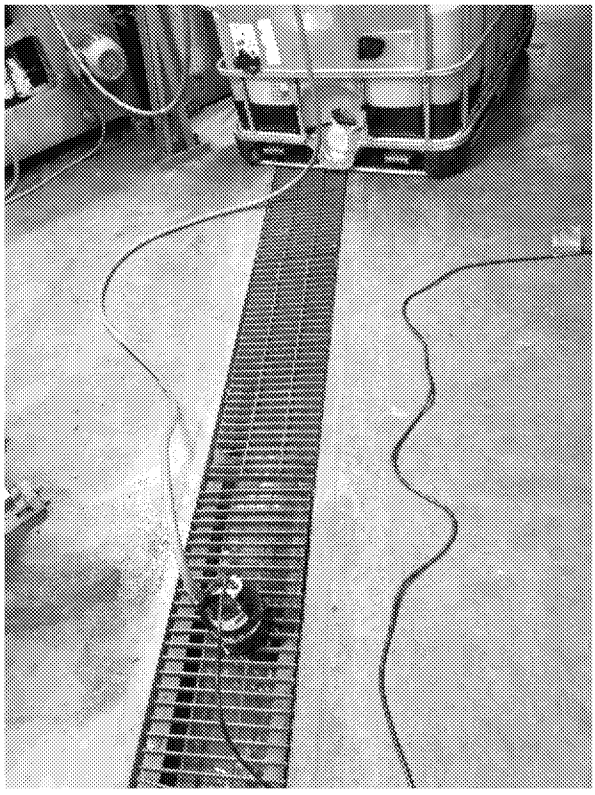


Photograph #22: trough in the floor of the OD shop (contained liquid at the time of the inspection)



Photograph #23: trough in the floor of the OD shop (liquid being pumped into a 330-gallon tote)

PHOTOGRAPHS OF THE INSTALLATION



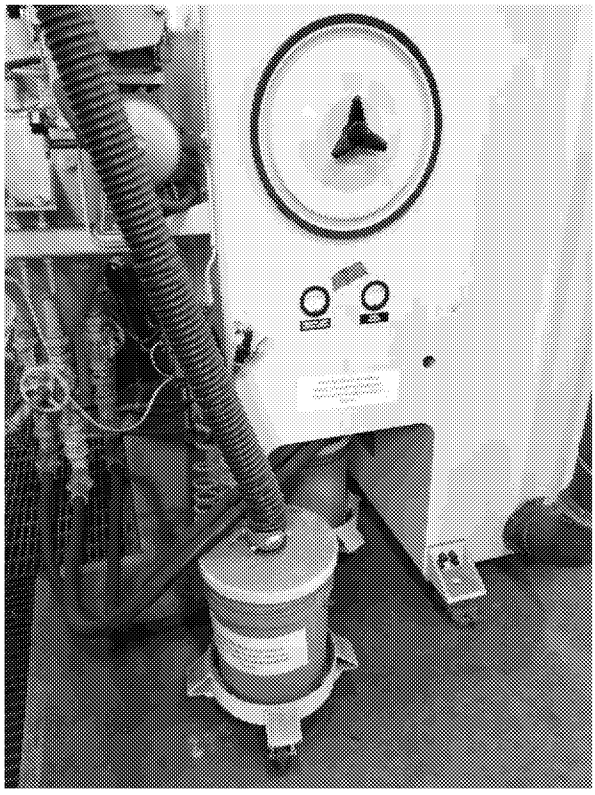
Photograph #24: trough in the floor of the OD shop (liquid being pumped into a 330-gallon tote)

Photograph #25: container of used coolant (not waste) in the OD shop

Photograph #26: satellite accumulation container in the OD shop (waste on side of drum)

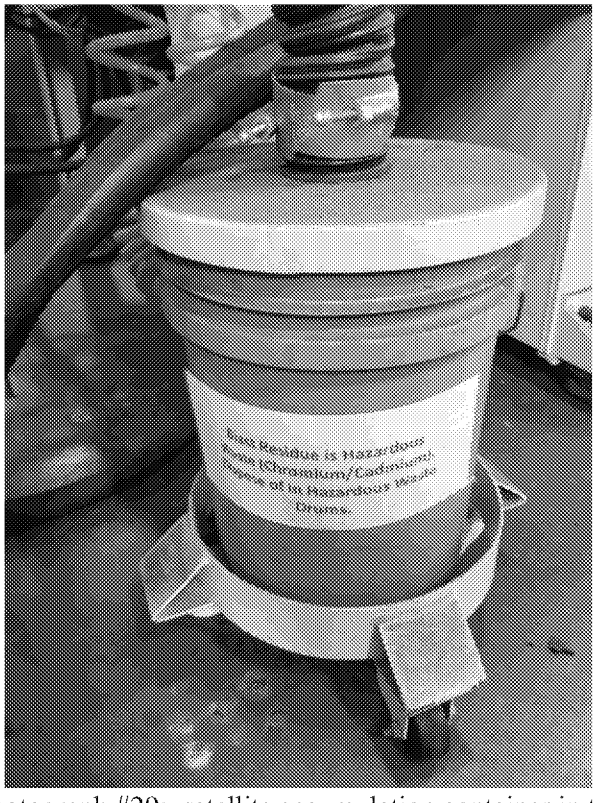
Photograph #27: open satellite accumulation container in the OD shop (waste on side of drum)

PHOTOGRAPHS OF THE INSTALLATION

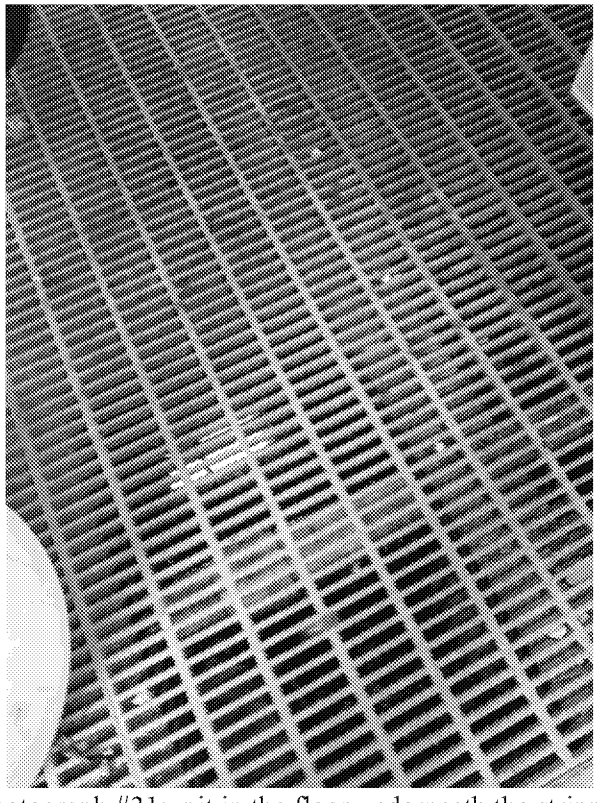


Photograph #28: satellite accumulation container in the OD shop

Photograph #30: satellite accumulation container in the OD shop



Photograph #29: satellite accumulation container in the OD shop

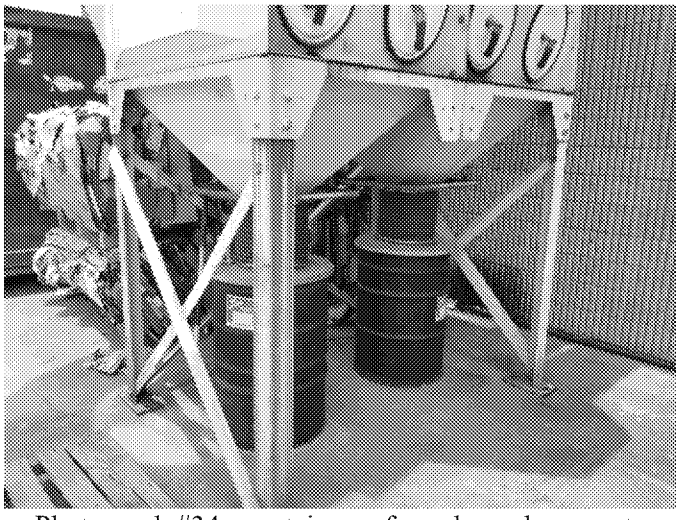


Photograph #31: pit in the floor underneath the stripper shop (contained liquid at the time of the inspection)

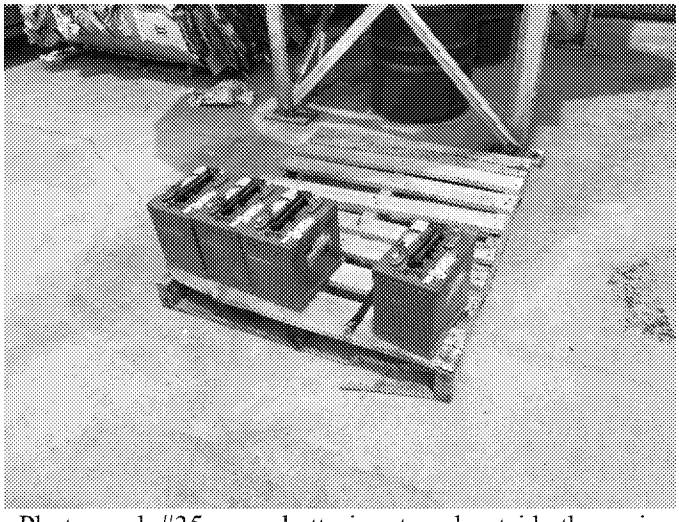
PHOTOGRAPHS OF THE INSTALLATION

Photograph #32: container of non-hazardous waste attached to a dust collector

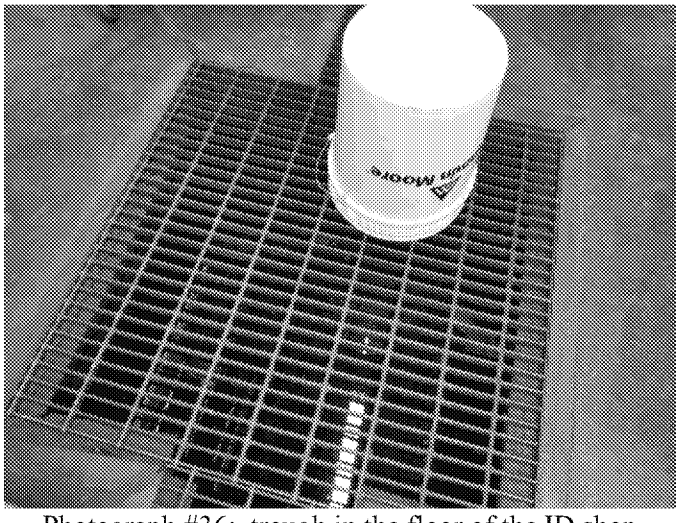
Photograph #33: container of non-hazardous waste attached to a dust collector



Photograph #34: containers of non-hazardous waste attached to a dust collector



Photograph #35: new batteries staged outside the main building



Photograph #36: trough in the floor of the ID shop (contained liquid at the time of the inspection)

PHOTOGRAPHS OF THE INSTALLATION

Photograph #37: satellite accumulation container in the ID shop

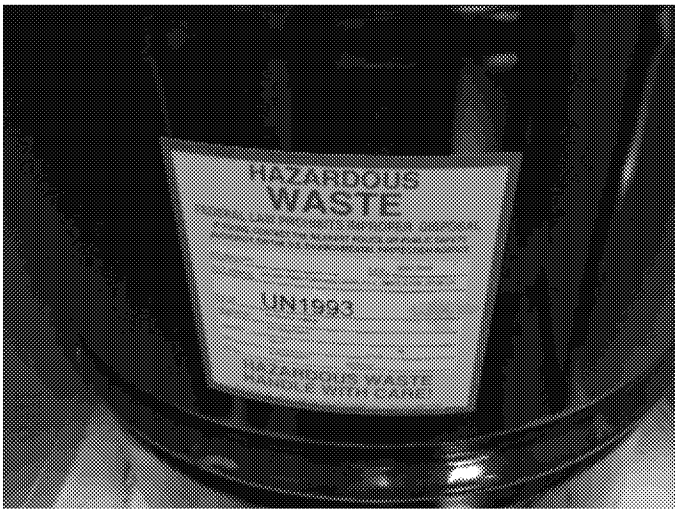
Photograph #38: open satellite accumulation container in the ID shop (inside the paint booth)

Photograph #39: open satellite accumulation container in the ID shop (inside the paint booth)

Photograph #40: uncontained, unlabeled universal waste lamps in the ID shop

PHOTOGRAPHS OF THE INSTALLATION

Photograph #41: open container of universal waste lamps in the maintenance area

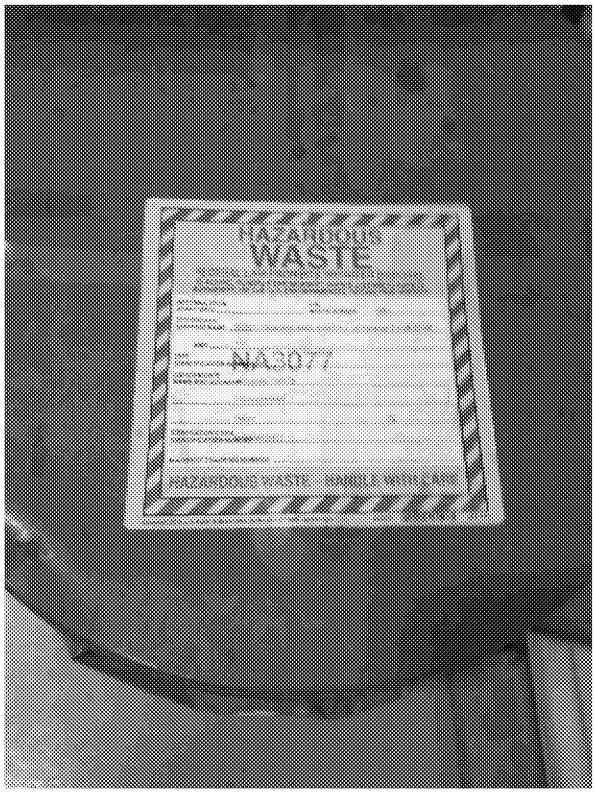


Photograph #43: open satellite accumulation container staged outside of the Plasma ™ coating area

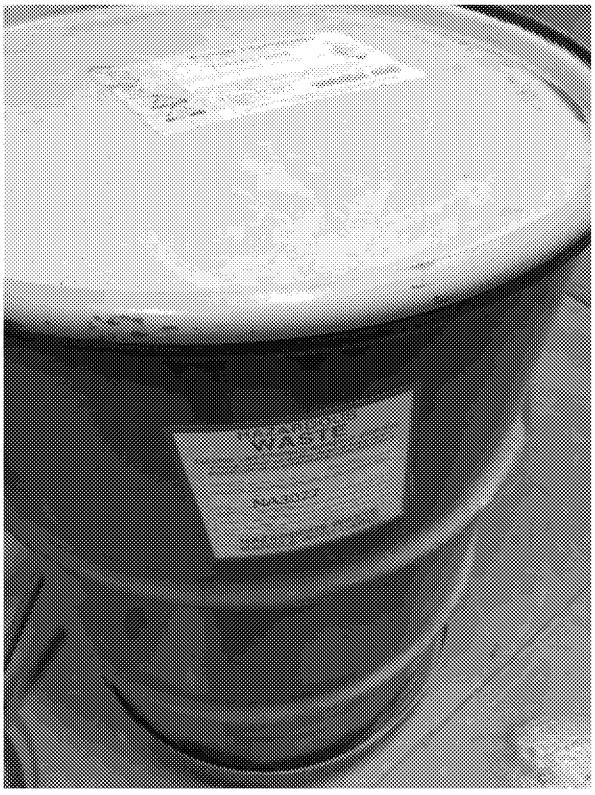
Photograph #42: open satellite accumulation container staged outside of the Plasma ™ coating area

Photograph #44: satellite accumulation container in the LG building preparation area

PHOTOGRAPHS OF THE INSTALLATION



Photograph #45: satellite accumulation container in the LG building preparation area



Photograph #47: open satellite accumulation container in the LG building preparation area

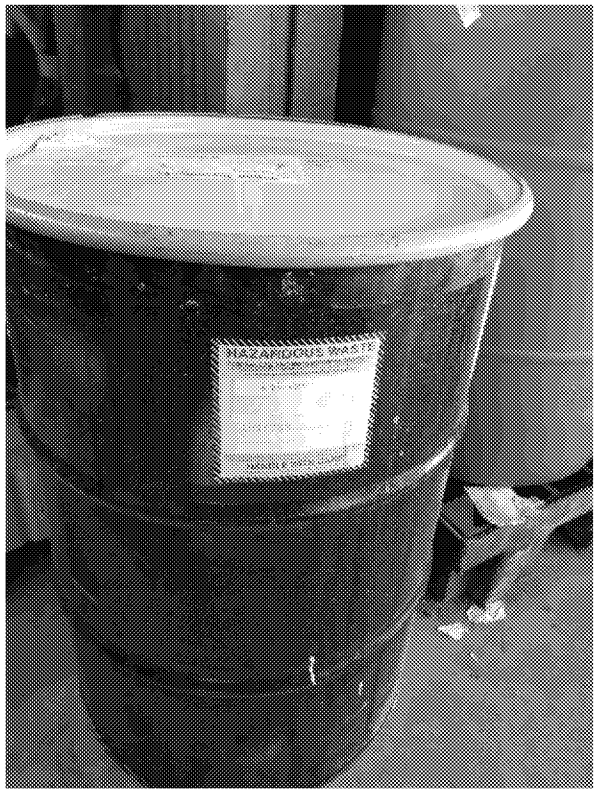
Photograph #46: satellite accumulation container in the LG building preparation area

Photograph #48: warning signs posted near the entrance to the CAA

PHOTOGRAPHS OF THE INSTALLATION

Photograph #49: containers of hazardous waste in the CAA

Photograph #50: containers of hazardous waste in the CAA

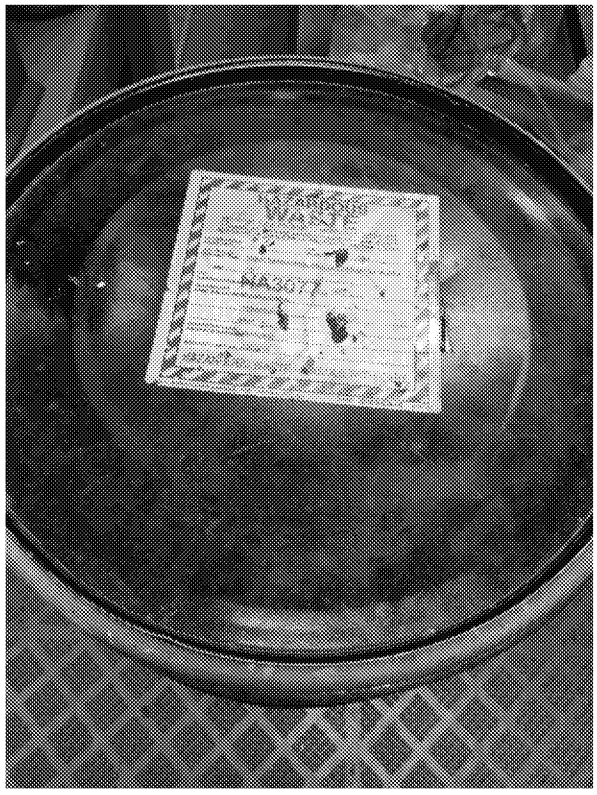


Photograph #51: container of hazardous waste in the CAA

Photograph #52: container of used oil in the CAA

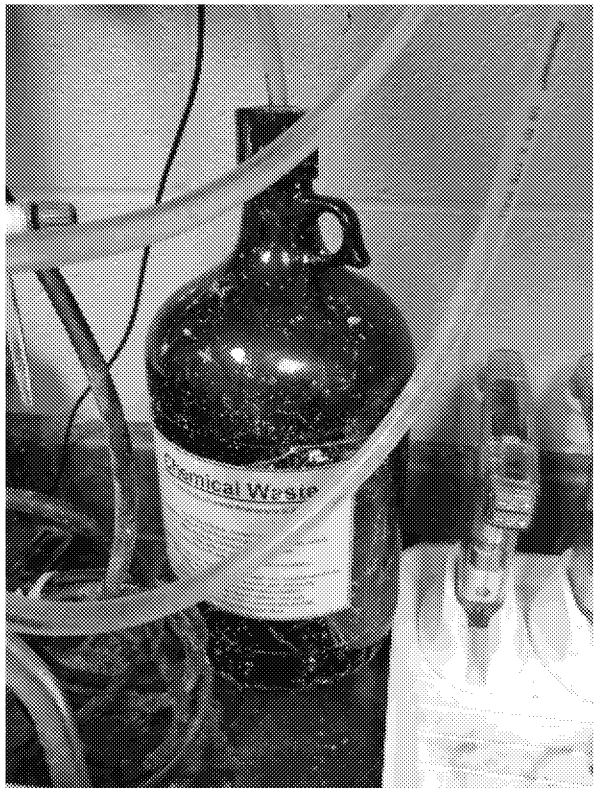
PHOTOGRAPHS OF THE INSTALLATION

Photograph #53: container of used oil in the CAA



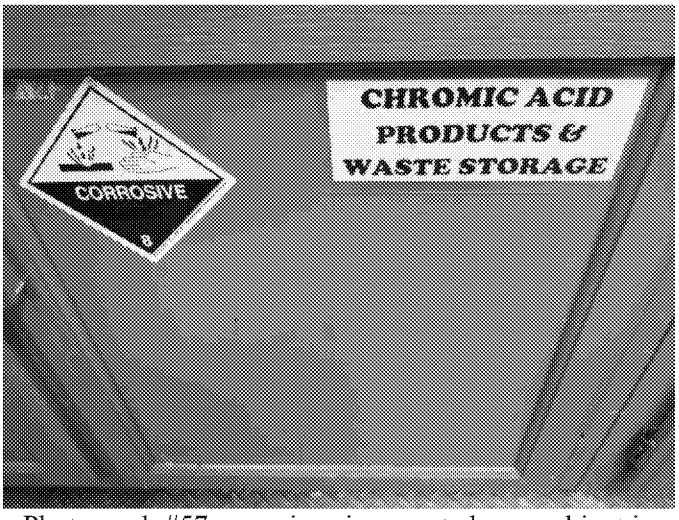
Photograph #55: open satellite accumulation container in the QA/QC laboratory

Photograph #54: open satellite accumulation container in the QA/QC laboratory



Photograph #56: improperly labeled satellite accumulation container in the QA/QC laboratory

PHOTOGRAPHS OF THE INSTALLATION



Photograph #57: warning signs posted on a cabinet in the QA/QC laboratory

Photograph #58: satellite accumulation containers in a cabinet in the QA/QC laboratory